

FILED IN DISTRICT COURT
CREEK COUNTY SAPULPA OK

IN THE DISTRICT COURT WITHIN AND FOR CREEK COUNTY
STATE OF OKLAHOMA

AUG 19 2014
TIME
Amanda VanOrsdol, COURT CLERK

LARRY LEE ASHLOCK,

Plaintiff,

v.

TERRE SUE NELSON and
STATE FARM MUTUAL
AUTOMOBILE INSURANCE
COMPANY,

Defendants,

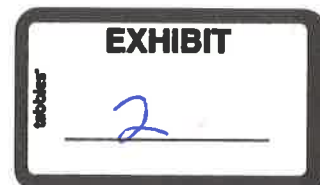
Case No. CJ-2014-123

ATTORNEY'S LIEN CLAIMED

PLAINTIFF'S FIRST AMENDED PETITION

Comes now the Plaintiff Larry Ashlock and for his claim of and cause of action against the Defendant, Terre Sue Nelson, alleges and states as follows:

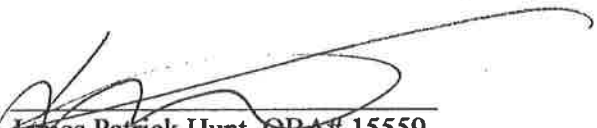
1. That Plaintiff Larry Ashlock is a resident and citizen of Creek County, Oklahoma.
2. That Defendant Terre Nelson is a resident and citizen of Tulsa County, Oklahoma.
3. That Defendant State Farm is a foreign corporation engaged in the casualty insurance business in numerous state including the State of Oklahoma.
4. That the vehicle collision giving rise to this claim occurred in Creek County, and this Court has jurisdiction over the subject matter.
5. That on May 1, 2012, Plaintiff was a driver of a vehicle that was struck by a vehicle negligently operated by Defendant Nelson, which caused serious injuries to Plaintiff.



6. That as a result of the negligence of Defendant Nelson, Plaintiff incurred property damage to his vehicle, medical expenses for the treatment of injuries both past and future, and has suffered great pain of body and mind.
7. That on May 1, 2012, the date of the motor vehicle collision, the Plaintiff was insured by the Defendant State Farm on the vehicle which he was riding during the collision. Specifically, the Plaintiff was insured by State Farm Policy no. 22 3688-D26-36. Further, the above policy had uninsured/underinsured motorists (UM) coverage of \$100,000.00.
8. At no time did the Plaintiff agree in writing or orally to reduce his UM coverage from \$100,000.00 to \$25,000.00. However Defendant State Farm has taken the position that the Plaintiff has only \$25,000.00 in UM coverage.

WHEREFORE, Plaintiffs prays for judgment for compensatory judgment in a sum in excess of \$125,000.00 and an award of reasonable attorney fees and all other costs of this action against Defendants.

Respectfully submitted,



James Patrick Hunt, OBA# 15559
Attorney for Plaintiff
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74103